

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

-against-

JOHNATHAN VIGIL,

Defendant.

No.: 19-cr-03113 (JB)

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW Defendant Johnathan Vigil, by his court-appointed counsel, Wayne Baker, Esq., and with the consent of US Probation Officer Robert Vigil, with AUSA Elaine Ramirez taking no position, hereby request a modification to the Order Setting Conditions of Release imposed on June 23, 2023 (Doc. 793), entered by agreement of the parties, to place Mr. Vigil at La Pasada Halfway House. The parties now agree that Mr. Vigil should no longer be in the custody of La Pasada Halfway House, for the reasons that follow:

1. Mr. Vigil has been completely compliant with all conditions and requirements at La Pasada Halfway House.
2. Mr. Vigil has been continuously employed; he has a full-time job and has an additional job arranged.
3. Mr. Vigil has passed all of his drug tests.
4. Mr. Vigil has attended all of his counseling and therapy sessions.
5. Mr. Vigil has put a down-payment on an apartment which has been approved by Probation.

Accordingly, it is respectfully requested that an Order Modifying Conditions of Release be entered, removing the requirement of Document 793, "Order Modifying Setting Conditions of Release" that Johnathan Vigil be placed in the custody of La Pasada Halfway House, with all other imposed conditions remaining in effect.

Respectfully submitted,

Wayne Baker

Wayne Baker, Esq.

Law Office of Wayne Baker

Counsel for Defendant Johnathan Vigil

I hereby certify that I filed the foregoing electronically on August 31, 2023, through the CM/ECF system, which caused counsel for the Government and the parties to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

Wayne Baker

Wayne Baker, Esq.